

USAir

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DEPARTMENT OF TRANSPORTATION

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DOCKET SECTION

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.**

U.S.-TORONTO SERVICE PROCEEDING

Docket 50168

**REBUTTAL EXHIBITS
OF
USAIR, INC.**

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April 4, 1995

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USAir's Rebuttal Exhibits

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NARRATIVE INTRODUCTION TO USAIR'S REBUTTAL EXHIBITS

USAIR'S rebuttal exhibits demonstrate that USAir should be selected to continue operations between Pittsburgh and Toronto. USAir ranks first or second in DOT's historic selection criteria (US-R-101.) USAir offers more seats than any of the applicants in the Toronto gateway markets (US-R-113.) USAir is proposing double daily B-757 service with single plane service to Seattle and San Diego in the summer and Orlando and Phoenix in the winter. USAir's service is superior to that proposed by the other applicants. Although Delta offers B-757 service, it fails to offer single plane behind service. The other applicants plane to offer single plane service to points behind the gateway, but it will be with smaller narrow body equipment. US-R-114 demonstrates that USAir will offer more seats than any other applicant to single plane behind gateway points. USAir's Pittsburgh hub is the best positioned hub to maximize feed traffic between the U.S. and Toronto (US-R-105.) USAir's size and Pittsburgh's geographic location give USAir the unique ability to offer more connections via Pittsburgh to and from Toronto than any other applicant (US-R-102.) Furthermore, USAir will carry more traffic than any other applicants between its U.S. points behind Pittsburgh and Toronto (US-R-103.) Overall significantly more passengers will choose to use USAir's service than the service of Continental, Northwest or TWA.

USAir's Pittsburgh Hub

Pittsburgh is USAir's largest hub geographically positioned to take optimum advantage of flow traffic from the large U.S.-Toronto market. With Pittsburgh-Toronto nonstop service, USAir will be able to effectively compete in the total U.S.-Toronto market. Pittsburgh-Toronto nonstop authority will

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give USAir the ability to compete with Northwest at Detroit and American and United at Chicago for U.S.-Toronto traffic. Philadelphia, located 254 miles east of Pittsburgh, does not offer USAir non-circuitous access to Toronto that it needs to effectively compete with these three larger carriers in the U.S.-Toronto market. Over 80 USAir points containing 2.4 million passengers are better served via Pittsburgh (US-R-118.) The small O&D of the local market makes it a less important decisional factor in this case.

USAir's large Pittsburgh hub combined with the geographic location of Pittsburgh make USAir the best candidate for receiving the permanent authority. Positioned 222 miles south of Toronto, Pittsburgh is ideally located to flow traffic to and from Toronto.

USAir's Pittsburgh hub is larger than Continental at Newark, Northwest at Minneapolis and TWA at St. Louis.¹ Its size combined with its geographic location makes USAir the premier carrier for selection in this case. USAir's Pittsburgh hub will connect 84 cities with round trip nonstop service to Toronto. These cities generated 3.4 million Toronto passengers in fiscal year 1994 (US-R-102.) By contrast Delta will connect only 51 cities, TWA 46 cities, Northwest 42 cities and Continental 36 cities to Toronto.

US-R-105 graphically illustrates the location of each carrier hub. All other applicants' hubs have more limited geographical catchment areas for Toronto traffic. Continental's hub is located in the congested Northeast of the U.S., and will draw on a catchment area from the Eastern U.S. and

¹ DL-117.

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Florida. Delta's catchment area is limited to the Southeastern and Southwestern U.S. Minneapolis, located in the upper Midwest, limits Northwest's catchment area to the Northwest and Western segment of the U.S. Finally, TWA's catchment area will be limited to the western section of the Southern U.S. and the Western U.S.

USAir Seats and Service

USAir will offer more seats than any other applicant (US-R-113.) USAir is proposing double daily service with new B-757 aircraft. Delta is also proposing double daily B-757 service for the gateway segment, but will not provide any single plane behind gateway service. All other applicants are proposing double daily service with smaller narrow body equipment. Northwest is proposing to operate the older DC-9 aircraft with only 100 seats. USAir will offer 82% more seats than Northwest. Continental and TWA also will operate smaller narrow body equipment. USAir will operate 42% and 38% more seats than each. A comparison of single plane behind seats is shown at US-R-114. Similar to the gateway segment, USAir will offer more seats than the other applicants in behind gateway single plane markets.

Traffic Forecast

USAir's traffic forecast is the most conservative among the applicants. USAir used the FY 1994 O&D traffic base and grew it at an annual rate of 1.9% to the forecast period. By contrast, Continental used a 5% annual growth rate. TWA used a 4.5% growth rate, and Delta and Northwest used 3.0% each. USAir did not use service stimulation or make any adjustments to the base to

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develop the forecast market size. Delta, Northwest and TWA used service stimulations of 50%, 15% and 100% respectively for their gateway markets.² For behind markets, Delta, Northwest and TWA similarly used stimulation that ranged between 10% and 50%.³ Although Continental did not use service stimulation, it arbitrarily increased the traffic base by 10% for so called "under reporting".⁴

USAir exhibit US-R-111 adjusts its traffic forecast using the other carriers' growth rates excluding stimulation assumptions. Under the other applicants growth formulas USAir's traffic would increase anywhere from 4,700 to 18,500 passengers. Load factors would increase anywhere from 3 to 12 percentage points.

² Delta's service stimulation of 50% in the Atlanta-Toronto market appears excessive in view of its historic operations of four daily one stop services. Service stimulation in the Atlanta-Toronto market accounts for 26,484 passengers in Delta's forecast passengers. If these passengers were subtracted from Delta's forecast, Delta's forecast passengers would be 156,395 or less than USAir's forecast for Pittsburgh-Toronto segment.

³ Source: DL-301, NW-301, and TW-301.

⁴ Source: CO-301.

COMPARISON OF APPLICANTS SERVICE PROPOSALS AND FORECASTS FOR U.S.-TORONTO

(REBUTTAL TO APPLICANTS SERVICE PROPOSALS AND TRAFFIC FORECAST)

USAIR

CONTINENTAL

DELTA

NORTHWEST

TWA

Schedule

Gateway
Single Plane Behind Point

	Source:			Source:			Source:			Source:			Source:	
	Pittsburgh	US-201	Newark	CO-201	Atlanta	DL-101	Minneapolis	NW-202	St. Louis	TW-151				
	Winter	Summer	All Year	CO-201	NONE	DL-101	All Year	NW-202	All Year	TW-151				
	Seattle	Orlando	Ft. Lauderdale	CO-201			Boise	NW-202	Phoenix	TW-151				
	San Diego	Phoenix	Orlando	CO-201			Salt Lake City	NW-202	San Diego	TW-151				
Service Level	2 Daily RTs	US-201	2 Daily RTs	CO-201	2 Daily RTs	DL-101	2 Daily RTs	NW-202	2 Daily RTs	TW-151				
Equipment														
Aircraft Type	B-757	US-201	B-737	CO-201	B-757	DL-101	DC-9	NW-202	MD-80	TW-151				
Seats	182	US-202	128	CO-201	180	DL-101	100	NW-200	132	TW-151				
Seating Configuration	24/158	US-202	10/118	CO-201	24/156	DL-101	12/88		12/120	TW-151				
Activity Statistics														
(Annual)														
Completion Factor	98%	US-403	98.2%	1/	97.8%	1/	99.0%	1/	99.7%	1/				
Total Seats(Both Directions)	250,132	US-403	184,064	CO-401	257,760	1/	145,000	1/	192,720	1/				
Total Frequencies	1,435	US-403	1,438	CO-401	1,432	DL-403	1,450	NW-404	1460	TW-404				
Forecast Passengers	158,000	US-301	126,032	CO-301	182,879	DL-301	109,024	NW-301	105,170	TW-301				
Load Factor	63.2%	US-403	68.5%	1/	70.9%	1/	75.2%	1/	54.6%	1/				

1/ Calculated.

COMPARISON OF APPLICANTS SERVICE PROPOSALS AND FORECASTS FOR U.S.-TORONTO

(REBUTTAL TO APPLICANTS SERVICE PROPOSALS AND TRAFFIC FORECAST)

	USAIR		CONTINENTAL		DELTA		NORTHWEST		TWA	
<u>Passenger Forecast</u>		Source:		Source:		Source:		Source:		Source:
Traffic Base	FY1994 O&D	US-301	CY 1993 O&D	CO-301	CY 1993 O&D	DL-301	CY 1993	NW-301	FY 1994	TW-301
<u>Adjustments</u>	-									
Underreporting	No		10.0%	CO-301						
Stimulation	No		No		50.0% Market	DL-301	15.0% Market	NW-301	100.0% Market	TW-301
					2.0% Behind Points	DL-301	10.0% Salt Lake	NW-301	0.0% Phoenix	TW-301
							30.0% Boise	NW-301	50.0% San Diego	TW-301
<u>Traffic Mix</u>										
Gateway	15,559	US-301	59,964	CO-301	79,453	DL-301	18,096	NW-301	46,230	TW-301
Single plane behind point	16,126	US-301	16,615	CO-301	-	DL-301	5,799	NW-301	17,309	TW-301
RT Single Connex	120,238	US-301	35,109	CO-301	103,426	DL-301	80,936	NW-301	36,732	TW-301
RT Double Connects	-		-	CO-301	-	DL-301	-		-	TW-301
Interline Connections	6,077	US-301	8,760	CO-301	-	DL-301	4,193	NW-301	4,900	TW-301
Other	-		5,584	Code Share Premium	-	DL-301	-		-	TW-301
Total	158,000		126,032		182,879		109,024		105,171	
Online Behind Cities	95	US-301	53	CO-301	66	DL-301	59	NW-301	52	TW-301
Online Behind Cities Traffic (Base Year)	3,481,010	US-301	1,199,450	CO-301	951,080	DL-301	1,311,820	NW-301	1,050,580	TW-301
Annual Growth	1.9%	US-301	5.0%	CO-301	3.0%	DL-301	3.0%	NW-301	4.5%	TW-301
<u>Market Share</u>										
Method	QSI INTERNAL MODEL		QSI INTERNAL MODEL	CO-301	QSI MODEL	DL-301	QSI		QSI	
%										
Passengers										
Gateway	48.4%	US-301	20.0%	CO-301	55.0%	DL-301	30.0%	NW-301	75.0%	TW-301
Single Plane	8.3%	US-301	12.5%	CO-301	-	DL-301	24.5%	NW-301	14.8%	TW-301
Connex Single Online	3.4%	US-301	2.9%	CO-301	10.2%	DL-301	5.6%	NW-301	3.6%	TW-301
<u>Cargo Forecast</u>										
Annual Tons	1591	US-403	331	CO-205 CO-205	NONE	DL-402	803	NW-402	NONE	TW-401

COMPARISON OF APPLICANTS SERVICE PROPOSALS AND FORECASTS FOR U.S.-TORONTO

(REBUTTAL TO APPLICANTS SERVICE PROPOSALS AND TRAFFIC FORECAST)

USAIR

CONTINENTAL

DELTA

NORTHWEST

TWA

Financials (000)

Operating Revenues

Passenger	\$29,315	US-401	\$13,528	CO-401	\$35,648	DL-402	\$21,870	NW-401	\$19,714	TW-401
Cargo	\$741	US-401	\$361	CO-401	\$1,540	DL-402	\$404	NW-401	\$374	TW-401
Other	\$2,183	US-401	\$161	CO-401		DL-402	\$919	NW-401	-	TW-401
Total	\$32,239	US-401	\$14,050		\$37,188	DL-402	\$23,193		\$20,088	

Operating Expense

	\$16,348	US-401	\$11,863	CO-401	\$20,848	DL-402	\$13,107	NW-401	\$13,474	TW-401
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Profit

	\$15,892	US-401	\$2,187	CO-401	\$16,340	DL-402	\$10,086	NW-401	\$6,614	TW-401
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Profit Margin

(% OF Revenue)

49.3%		15.6%		43.9%		43.5%		32.9%	
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USAIR RANKS FIRST OR SECOND IN CARRIER SELECTION CRITERIA

(REBUTTAL TO: CO-201, DL-101, NW-202, AND TW-151)

SEATS ON SEGMENT	FIRST
SEATS SINGLE PLANE SERVICE	FIRST
BEYOND POINTS	FIRST
BEYOND TRAFFIC	FIRST
HUB LOCATION TO MAXIMIZE FEED	FIRST
TOTAL TRAFFIC	SECOND

SOURCES: SEATS ON SEGMENT US-R-113, SEATS SINGLE PLANE SERVICE US-R-114, BEYOND POINTS US-R-101, BEYOND TRAFFIC US-R-101, HUB LOCATION TO MAXIMIZE FEED US-R-105, TOTAL TRAFFIC US-R-104.

**USAIR SERVES MORE BEYOND CITIES WITH MORE TRAFFIC
THAN ANY OTHER APPLICANT**

(REBUTTAL TO: CO-301, DL-301, NW-301, TW-301)

<u>CARRIER</u>	<u>HUB</u>	<u>BEYOND CITIES</u>	<u>BEYOND TRAFFIC</u>
USAIR	PITTSBURGH	84	3,412,830
CONTINENTAL	NEWARK	36	1,545,090
DELTA	ATLANTA	51	1,384,300
TWA	ST. LOUIS	46	1,004,930
NORTHWEST	MINNEAPLOIS	42	712,430

SOURCES: US-R-106 THRU US-R-109.

**USAIR CARRIES MORE BEHIND TRAFFIC
THAN ANY OTHER APPLICANT**

(REBUTTAL TO: CO-301, DL-301, NW-301, TW-301)

<u>CARRIER</u>	<u>HUB</u>	<u>USAIR BEYOND TRAFFIC</u>
USAIR	PITTSBURGH	142,441
DELTA	ATLANTA	103,426
NORTHWEST	MINNEAPOLIS	90,928
CONTINENTAL	NEWARK	66,068
TWA	ST. LOUIS	58,941

SOURCES: US-R-101.

**USAIR CARRIES MORE TOTAL TRAFFIC
THAN CONTINENTAL, NORTHWEST AND TWA**

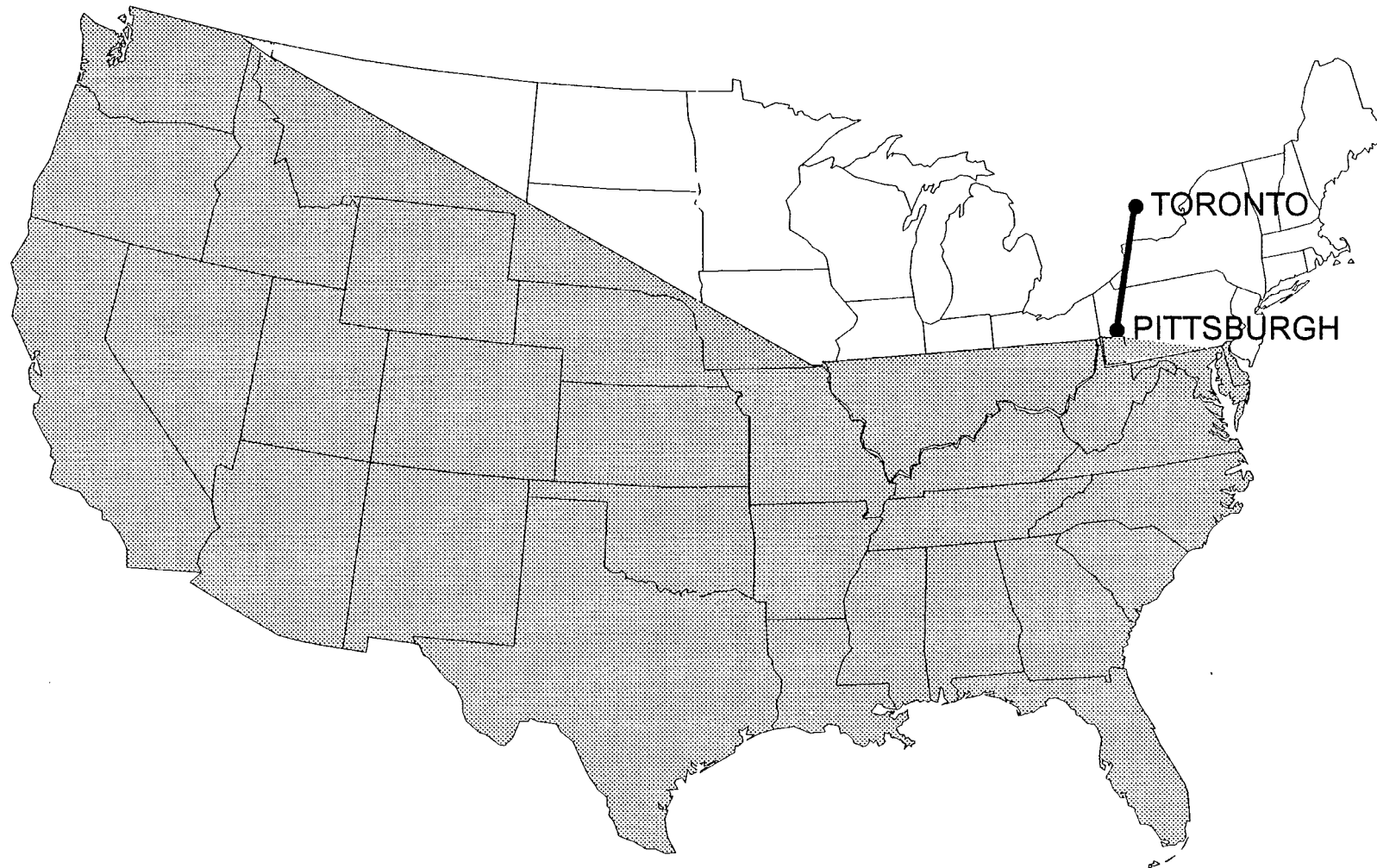
(REBUTTAL TO: CO-301, NW-301, TW-301)

<u>CARRIER</u>	<u>HUB</u>	<u>TOTAL TRAFFIC</u>
USAIR	PITTSBURGH	158,000
CONTINENTAL	NEWARK	126,032
NORTHWEST	MINNEAPOLIS	109,024
TWA	ST. LOUIS	105,171

SOURCES: US-R-101.

USAIR'S PITTSBURGH HUB OFFERS THE BROADEST NON-CIRCUITOUS ACCESS TO TORONTO

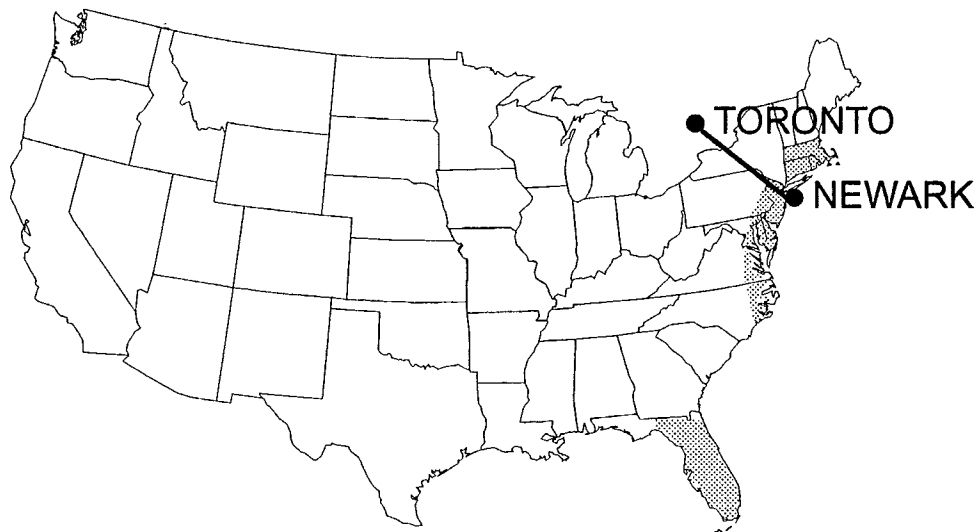
(REBUTTAL TO:CO, DL, NW, AND TWA SERVICE PROPOSALS)



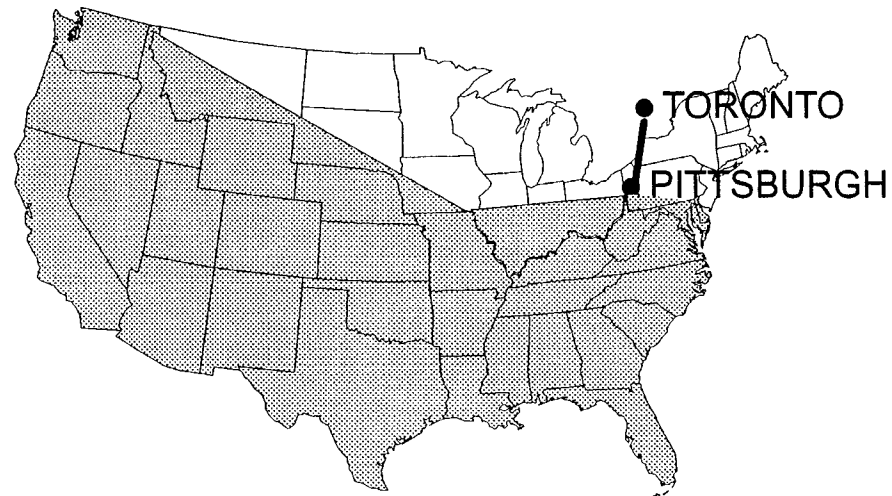
NOTE: SHADED AREA INDICATES 25% OR LESS CIRCUITY VIA PITTSBURGH.

● **USAIR'S PITTSBURGH HUB OFFERS THE BROADEST
NON-CIRCUITOUS ACCESS TO TORONTO**
(REBUTTAL TO: CO'S SERVICE PROPOSAL)

CONTINENTAL'S HUB



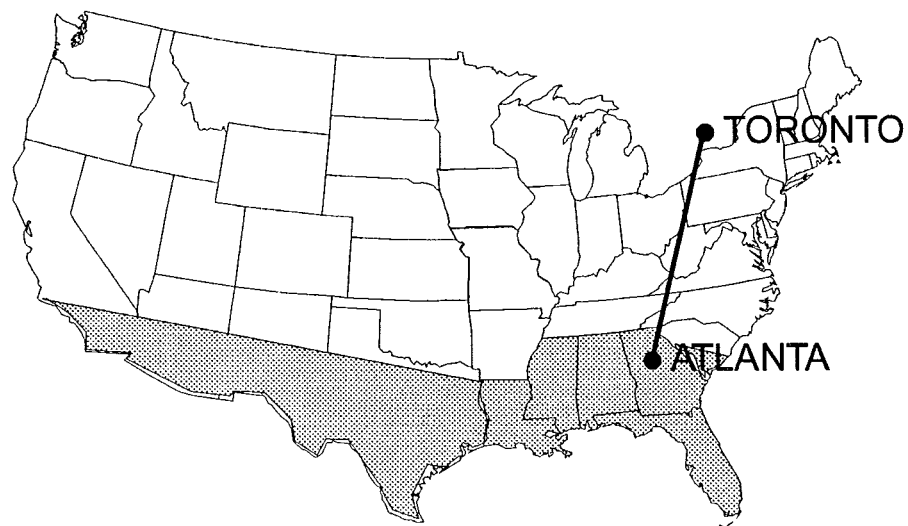
USAIR'S HUB



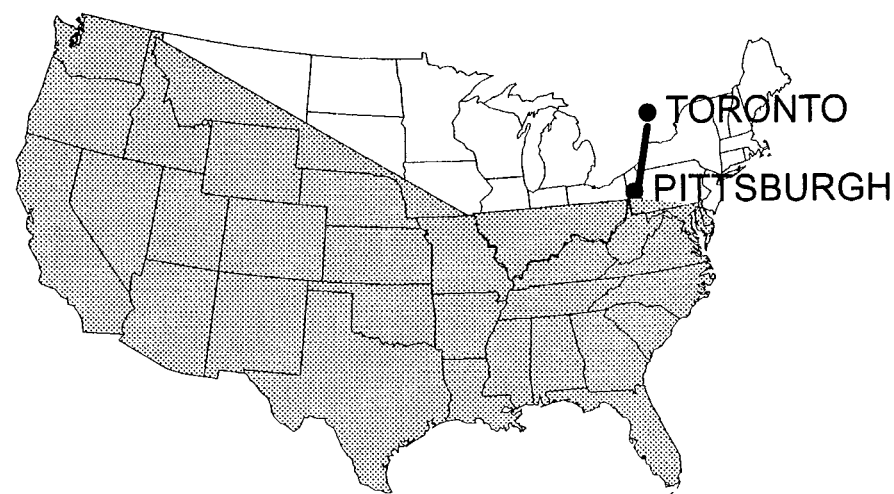
NOTE: SHADED AREA INDICATES 25% OR LESS CIRCUITY TO TORONTO VIA NEWARK AND PITTSBURGH.

● **USAIR'S PITTSBURGH HUB OFFERS THE BROADEST
NON-CIRCUITOUS ACCESS TO TORONTO**
(REBUTTAL TO: DL'S SERVICE PROPOSAL)

DELTA'S HUB



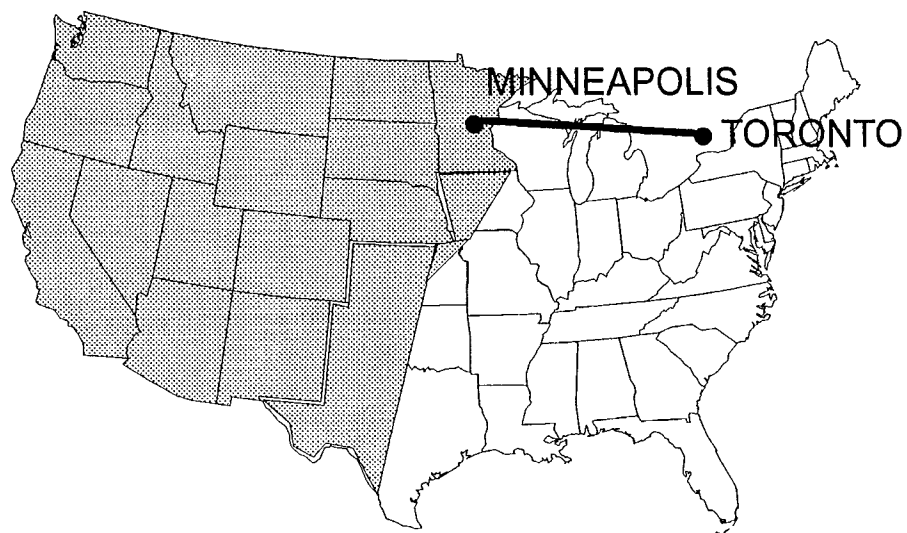
USAIR'S HUB



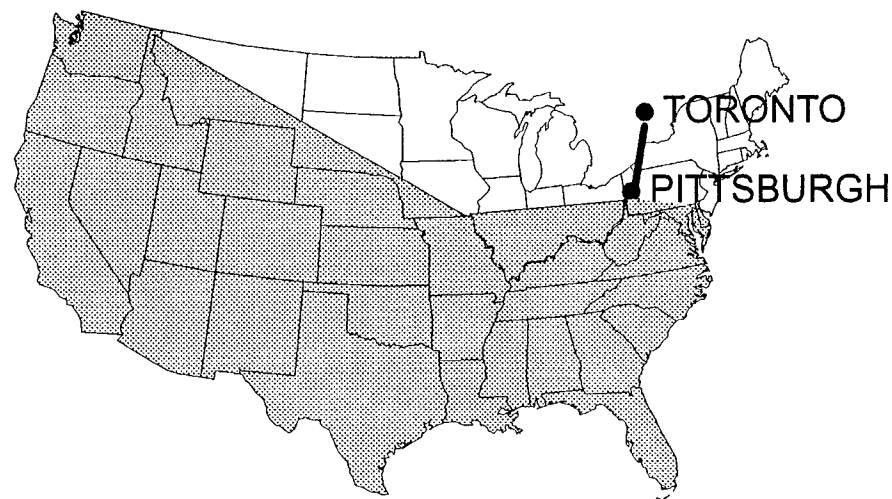
NOTE: SHADED AREA INDICATES 25% OR LESS CIRCUITY TO TORONTO VIA ATLANTA AND PITTSBURGH.

● **USAIR'S PITTSBURGH HUB OFFERS THE BROADEST
NON-CIRCUITOUS ACCESS TO TORONTO**
(REBUTTAL TO: NW'S SERVICE PROPOSAL)

NORTHWEST'S HUB



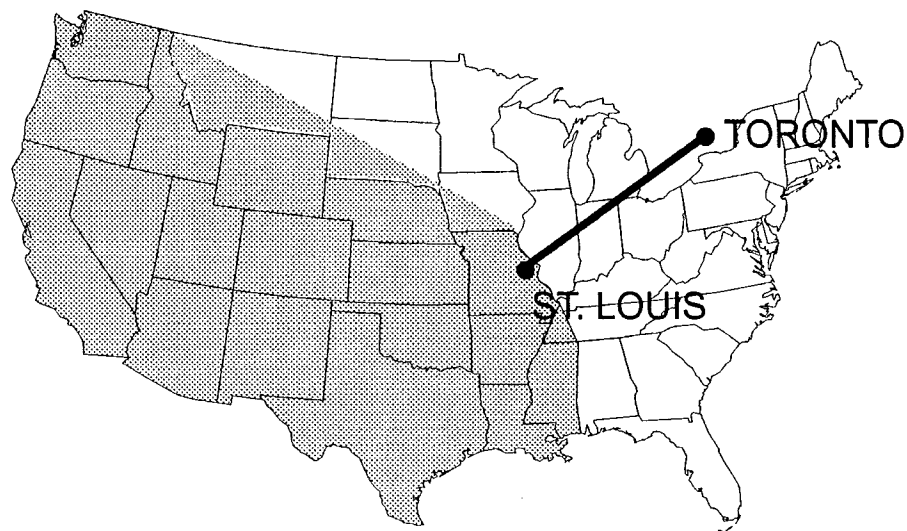
USAIR'S HUB



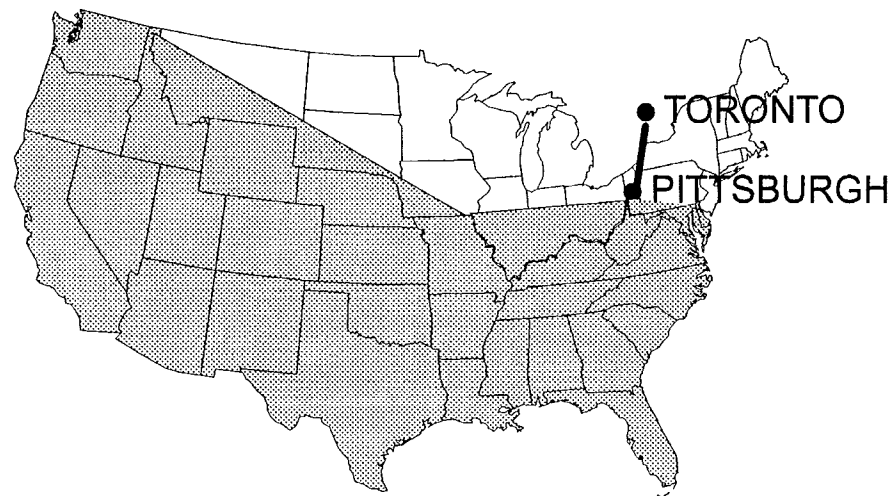
NOTE: SHADED AREA INDICATES 25% OR LESS CIRCUITY TO TORONTO VIA MINNEAPOLIS AND PITTSBURGH.

● **USAIR'S PITTSBURGH HUB OFFERS THE BROADEST
NON-CIRCUITOUS ACCESS TO TORONTO**
(REBUTTAL TO: TWA'S SERVICE PROPOSAL)

TWA'S HUB



USAIR'S HUB



NOTE: SHADED AREA INDICATES 25% OR LESS CIRCUITY TO TORONTO VIA ST. LOUIS
AND PITTSBURGH.

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY
HAVE FAR MORE TRAFFIC THAN CONTINENTAL'S BEYOND CITIES
(REBUTTAL TO CO-301)

	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>USAIR VIA</u> <u>PITTSBURGH</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>CONTINENTAL</u> <u>via NEWARK</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>
AKRON/CANTON	520	YES	520		
ALBANY	2,070	YES	2,070	YES	2,070
ALLENTOWN	3,270	YES	3,270	YES	3,270
ALTOONA	120	YES	120	YES	120
ASHLAND, KY/HUNTINGTON	310	YES	310		
ATLANTA	90,440	YES	90,440	YES	90,440
ATLANTIC CITY	1,370			YES	1,370
AUSTIN	11,130	YES	11,130		
BALTIMORE	19,580	YES	19,580	YES	19,580
BANGOR	700			YES	700
BINGHAMTON	90	YES	90	YES	90
BOSTON	213,410	YES	213,410	YES	213,410
BURLINGTON	1,310	YES	1,310		
CHARLESTON, WV	540	YES	540		
CHARLOTTESVILLE	1,060	YES	1,060		
CHARLOTTE	19,900	YES	19,900		
CHICAGO	325,130	YES	325,130		
CINCINNATI	8,340	YES	8,340		
CLARKSBURG, WV	320	YES	320		
CLEVELAND	52,910	YES	52,910	YES	52,910
COLUMBUS	11,410	YES	11,410	YES	11,410
CUMBERLAND	150	YES	150		
DALLAS/FT. WORTH	108,920	YES	108,920		
DAYTON	3,390	YES	3,390	YES	3,390
DENVER	41,960	YES	41,960	YES	41,960
DETROIT	81,870	YES	81,870		
FLINT	720	YES	720		
FT. LAUDERDALE	34,950	YES	34,950	YES	34,950
FT. MYERS	15,100	YES	15,100		
FT. WAYNE	3,690	YES	3,690		
GRAND RAPIDS	10,610	YES	10,610		
GREENBRIER	60	YES	60		
GREENSBORO/HIGH POINT	8,330	YES	8,330	YES	8,330
HAGERSTOWN	340	YES	340		
HARRISBURG	4,710	YES	4,710	YES	4,710
HARTFORD	24,040	YES	24,040	YES	24,040
HOUSTON	22,530	YES	22,530	YES	22,530
INDIANAPOLIS	15,520	YES	15,520	YES	15,520
ISLIP/LONG ISLAND	990	YES	990		
JACKSONVILLE, FL	9,190			YES	9,190
JOHNSTOWN	50	YES	50		
KALAMAZOO	3,920	YES	3,920		
KANSAS CITY	21,180	YES	21,180		
KNOXVILLE	4,440	YES	4,440		
LANCASTER	860	YES	860		
LANSING	1,570	YES	1,570		
LAS VEGAS	32,500	YES	32,500		
LEXINGTON/FRANKFORT	2,120	YES	2,120		
LOS ANGELES	242,650	YES	242,650	YES	242,650
LOUISVILLE	7,230	YES	7,230		
LYNCHBURG	440	YES	440		
MANCHESTER	1,690	YES	1,690	YES	1,690
MIAMI	208,180	YES	208,180	YES	208,180
MILWAUKEE	25,760	YES	25,760		
MINNEAPOLIS/ST. PAUL	53,220	YES	53,220		

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY
HAVE FAR MORE TRAFFIC THAN CONTINENTAL'S BEYOND CITIES
(REBUTTAL TO CO-301)

	<u>FY JUNE 94 TORONTO TRAFFIC</u>	<u>USAIR VIA PITTSBURGH</u>	<u>FY JUNE 94 TORONTO TRAFFIC</u>	<u>CONTINENTAL via NEWARK</u>	<u>FY JUNE 94 TORONTO TRAFFIC</u>
MORGANTOWN	160	YES	160		
NASHVILLE	45,340	YES	45,340		
NEW ORLEANS	30,250	YES	30,250		
NEWARK	752,110	YES	752,110		
NEWBURGH	340	YES	340		
NORFOLK	5,240	YES	5,240	YES	5,240
ORLANDO	67,810	YES	67,810	YES	67,810
PARKERSBURG	230	YES	230		
PHILADELPHIA	111,630	YES	111,630	YES	111,630
PHOENIX	56,890	YES	56,890	YES	56,890
PORTLAND ME	4,720			YES	4,720
PROVIDENCE	2,330	YES	2,330	YES	2,330
RALEIGH/DURHAM	30,440	YES	30,440		
READING	810	YES	810		
RICHMOND	7,230	YES	7,230	YES	7,230
ROANOKE	1,770	YES	1,770		
SAGINAW	2,090	YES	2,090		
SAN DIEGO	34,520	YES	34,520		
SAN FRANCISCO	175,690	YES	175,690		
SAN JUAN	15,090			YES	15,090
SANTA ANA	13,300	YES	13,300		
SARASOTA/BRADENTON	9,040	YES	9,040	YES	9,040
SCRANTON/WILKES-BARRE	1,610	YES	1,610		
SEATTLE	29,480	YES	29,480		
SOUTH BEND	5,380	YES	5,380		
STATE COLLEGE	370	YES	370		
ST. LOUIS	28,570	YES	28,570		
TAMPA	186,290	YES	186,290	YES	186,290
TOLEDO	710	YES	710		
WASHINGTON	45,040	YES	45,040	YES	45,040
WEST PALM BEACH	21,060	YES	21,060	YES	21,060
WHITE PLAINS	820	YES	820		
WILLIAMSPORT	520	YES	520		
WORCESTER	210			YES	210
YOUNGSTOWN	210	YES	210		
TOTAL		84	3,412,830	36	1,545,090

Notes: Excludes cities in western NY State and other cities with excessive circuitry.
For EWR, cities include those cited in CO's filing with roundtrip non-stop connections to YYZ.
For PIT, cities include those cited in US's filing with roundtrip non-stop connections to YYZ.

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY
HAVE FAR MORE TRAFFIC THAN DELTA'S BEYOND CITIES
(REBUTTAL TO DL-301)

	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>USAIR VIA</u> <u>PITTSBURGH</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>DELTA</u> <u>via ATLANTA</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>
AKRON/CANTON	520	YES	520		
ALBANY	2,070	YES	2,070		
ALLENTOWN	3,270	YES	3,270		
ALTOONA	120	YES	120		
ASHEVILLE	1900			YES	1,900
ASHLAND,KY/HUNTINGTON,W	310	YES	310		
ATLANTA	90,440	YES	90,440		
AUSTIN	11,130	YES	11,130		
BALTIMORE	19,580	YES	19,580		
BATON ROUGE	2300			YES	2,300
BINGHAMTON	90	YES	90		
BIRMINGHAM	4510			YES	4,510
BOSTON	213,410	YES	213,410		
BRISTOL,TN	1500			YES	1,500
BURLINGTON	1,310	YES	1,310		
CHARLESTON, SC	4260			YES	4,260
CHARLESTON, WV	540	YES	540		
CHARLOTTESVILLE	1,060	YES	1,060		
CHARLOTTE	19,900	YES	19,900	YES	19,900
CHATTANOOGA	3500			YES	3,500
CHICAGO	325,130	YES	325,130		
CINCINNATI	8,340	YES	8,340		
CLARKSBURG	320	YES	320		
CLEVELAND	52,910	YES	52,910		
COLUMBIA	3980			YES	3,980
COLUMBUS, GA	1340			YES	1,340
COLUMBUS, MS	600			YES	600
COLUMBUS, OH	11,410	YES	11,410		
CUMBERLAND	150	YES	150		
DALLAS/FT. WORTH	108,920	YES	108,920	YES	108,920
DAYTONA BEACH	3610			YES	3,610
DAYTON	3,390	YES	3,390		
DENVER	41,960	YES	41,960	YES	41,960
DETROIT	81,870	YES	81,870		
DOTHAN	230			YES	230
FLINT	720	YES	720		
FT. LAUDERDALE	34,950	YES	34,950	YES	34,950
FT. MYERS	15,100	YES	15,100	YES	15,100
FT. WAYNE	3,690	YES	3,690		
GAINESVILLE	1140			YES	1,140
GRAND RAPIDS	10,610	YES	10,610		
GREENBRIER	60	YES	60		
GREENSBORO/HIGH POINT	8,330	YES	8,330		
GREENVILLE/SPARTANBURG	6200			YES	6,200
GUAYBORO/BILOXI	450			YES	450
HARTFORD	340	YES	340		
HARRISBURG	4,710	YES	4,710		
HARTFORD	24,040	YES	24,040		
HOUSTON	22,530	YES	22,530	YES	22,530
HUNTSVILLE/DECATUR	3760			YES	3,760
INDIANAPOLIS	15,520	YES	15,520		
ISLIP/LONG ISLAND	990	YES	990		
JACKSONVILLE, FL	9,190			YES	9,190
JACKSON	2090			YES	2,090

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY
HAVE FAR MORE TRAFFIC THAN DELTA'S BEYOND CITIES
(REBUTTAL TO DL-301)

	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>USAIR VIA</u> <u>PITTSBURGH</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>DELTA</u> <u>via ATLANTA</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>
JOHNSTOWN	50	YES	50		
KALAMAZOO	3,920	YES	3,920		
KANSAS CITY	21,180	YES	21,180	YES	21,180
KNOXVILLE	4,440	YES	4,440	YES	4,440
LANCASTER	860	YES	860		
LANSING	1,570	YES	1,570		
LAS VEGAS	32,500	YES	32,500		
LEXINGTON/FRANKFORT	2,120	YES	2,120		
LITTLE ROCK	4060			YES	4,060
LOS ANGELES	242,650	YES	242,650	YES	242,650
LOUISVILLE	7,230	YES	7,230		
LYNCHBURG	440	YES	440		
MACON	90			YES	90
MANCHESTER	1,690	YES	1,690		
MEMPHIS	11470			YES	11,470
MERIDIAN	160			YES	160
MIAMI	208,180	YES	208,180	YES	208,180
MILWAUKEE	25,760	YES	25,760		
MINNEAPOLIS/ST.PAUL	53,220	YES	53,220		
MOBILE	1490			YES	1,490
MONROE	680			YES	680
MONTGOMERY	1370			YES	1,370
MORGANTOWN	160	YES	160		
MYRTLE BEACH	5140			YES	5,140
NASHVILLE	45,340	YES	45,340	YES	45,340
NEW ORLEANS	30,250	YES	30,250	YES	30,250
NEWARK	752,110	YES	752,110		
NEWBURGH	340	YES	340		
NORFOLK	5,240	YES	5,240		
ORLANDO	67,810	YES	67,810	YES	67,810
PANAMA CITY	3000			YES	3,000
PARKERSBURG	230	YES	230		
PENSACOLA	1970			YES	1,970
PHILADELPHIA	111,630	YES	111,630		
PHOENIX	56,890	YES	56,890		
PROVIDENCE	2,330	YES	2,330		
RALEIGH/DURHAM	30,440	YES	30,440		
READING	810	YES	810		
RICHMOND	7,230	YES	7,230		
ROANOKE	1,770	YES	1,770		
SAGINAW	2,090	YES	2,090		
SALT LAKE CITY	17540			YES	17,540
SAN ANTONIO	12080			YES	12,080
SAN DIEGO	34,520	YES	34,520		
SAN FRANCISCO	175,690	YES	175,690	YES	175,690
SAN JUAN	15,090			YES	15,090
SANTA ANA	13,300	YES	13,300		
SARASOTA/BRADENTON	9,040	YES	9,040		
SAVANNAH	4440			YES	4,440
SCRANTON/WILKES-BARRE	1,610	YES	1,610		
SEATTLE	29,480	YES	29,480		
SHREVEPORT	1640			YES	1,640
SOUTH BEND	5,380	YES	5,380		
STATE COLLEGE	370	YES	370		

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY
HAVE FAR MORE TRAFFIC THAN DELTA'S BEYOND CITIES
(REBUTTAL TO DL-301)

	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>USAIR VIA</u> <u>PITTSBURGH</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>DELTA</u> <u>via ATLANTA</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>
ST. LOUIS	28,570	YES	28,570		
TALLAHASSEE	1590			YES	1,590
TAMPA	186,290	YES	186,290	YES	186,290
TOLEDO	710	YES	710		
VALPARAISO	1380			YES	1,380
WASHINGTON	45,040	YES	45,040		
WEST PALM BEACH	21,060	YES	21,060	YES	21,060
WHITE PLAINS	820	YES	820		
WICHITA	4300			YES	4,300
WILLIAMSPORT	520	YES	520		
YOUNGSTOWN	210	YES	210		
TOTAL	3,550,880	84	3,412,830	51	1,384,300

Notes: Excludes cities in western NY State and other cities with excessive circuitry.
For ATL, cities include those cited in DL's filing with roundtrip non-stop connections to YYZ.
For PIT, cities include those cited in US's filing with roundtrip non-stop connections to YYZ.

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY
HAVE FAR MORE TRAFFIC THAN NORTHWEST'S BEYOND CITIES
(REBUTTAL TO NW-301)

	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>USAIR VIA</u> <u>PITTSBURGH</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>NORTHWEST</u> <u>via MINNEAPOLIS</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>
VERDEEN, SD	60			YES	60
AKRON/CANTON	520	YES	520		
ALBANY	2,070	YES	2,070		
ALBUQUERQUE	8,390			YES	8,390
ALLENTOWN	3,270	YES	3,270		
ALTOONA	120	YES	120		
APPLETON	4,080			YES	4,080
ASHLAND, KY/HUNTINGTON	310	YES	310		
ATLANTA	90,440	YES	90,440		
AUSTIN	11,130	YES	11,130		
BALTIMORE	19,580	YES	19,580		
BEMIDJI, MN	210			YES	210
BILLINGS	690			YES	690
BINGHAMTON	90	YES	90		
BISMARCK	300			YES	300
BOISE	2,040			YES	2,040
BOSTON	213,410	YES	213,410		
BOZEMAN	650			YES	650
BURLINGTON	1,310	YES	1,310		
CHARLESTON, WV	540	YES	540		
CHARLOTTESVILLE	1,060	YES	1,060		
CHARLOTTE	19,900	YES	19,900		
CHICAGO	325,130	YES	325,130		
CINCINNATI	8,340	YES	8,340		
CLARKSBURG	320	YES	320		
CLEVELAND	52,910	YES	52,910		
COLUMBUS	11,410	YES	11,410		
CUMBERLAND	150	YES	150		
DALLAS/FT. WORTH	108,920	YES	108,920		
DAYTON	3,390	YES	3,390		
DENVER	41,960	YES	41,960	YES	41,960
DES MOINES	5,610			YES	5,610
DETROIT	81,870	YES	81,870		
DULUTH	1,160			YES	1,160
FARGO	1,280			YES	1,280
FLINT	720	YES	720		
FT. LAUDERDALE	34,950	YES	34,950		
FT. MYERS	15,100	YES	15,100		
FT. WAYNE	3,690	YES	3,690		
GRAND FORKS	490			YES	490
GRAND RAPIDS	10,610	YES	10,610		
GREAT FALLS	200			YES	200
GREENBRIER	60	YES	60		
GREENSBORO/HIGH POINT	8,330	YES	8,330		
HAGERSTOWN	340	YES	340		
HARRISBURG	4,710	YES	4,710		
HARTFORD	24,040	YES	24,040		
HONOLULU	22,530	YES	22,530		
INDIANAPOLIS	15,520	YES	15,520		
INTERNATIONAL FALLS	310			YES	310
ISLIP/LONG ISLAND	990	YES	990		
JOHNSTOWN	50	YES	50		
KALAMAZOO	3,920	YES	3,920		
KANSAS CITY	21,180	YES	21,180		
KNOXVILLE	4,440	YES	4,440		
LA CROSSE	1,060			YES	1,060
LANCASTER	860	YES	860		
LANSING	1,570	YES	1,570		

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY
HAVE FAR MORE TRAFFIC THAN NORTHWEST'S BEYOND CITIES
(REBUTTAL TO NW-301)

	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>USAIR VIA</u> <u>PITTSBURGH</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>NORTHWEST</u> <u>via MINNEAPOLIS</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>
VEGAS	32,500	YES	32,500	YES	32,500
LEXINGTON/FRANKFORT	2,120	YES	2,120		
LINCOLN	2,360			YES	2,360
LOS ANGELES	242,650	YES	242,650	YES	242,650
LOUISVILLE	7,230	YES	7,230		
LYNCHBURG	440	YES	440		
MANCHESTER	1,690	YES	1,690		
MASON CITY	130			YES	130
MIAMI	208,180	YES	208,180		
MILWAUKEE	25,760	YES	25,760		
MINNEAPOLIS/ST. PAUL	53,220	YES	53,220		
MINOT	380			YES	380
MOLINE	3,480			YES	3,480
MORGANTOWN	160	YES	160		
NASHVILLE	45,340	YES	45,340		
NEW ORLEANS	30,250	YES	30,250		
NEWARK	752,110	YES	752,110		
NEWBURGH	340	YES	340		
NORFOLK	5,240	YES	5,240		
OMAHA	5,510			YES	5,510
ONTARIO	9,580			YES	9,580
ORLANDO	67,810	YES	67,810		
PARKERSBURG	230	YES	230		
PHILADELPHIA	111,630	YES	111,630		
PHOENIX	56,890	YES	56,890	YES	56,890
PORTLAND, OR	13,560			YES	13,560
PROVIDENCE	2,330	YES	2,330		
RALEIGH/DURHAM	30,440	YES	30,440		
RAPID CITY	580			YES	580
READING	810	YES	810		
RENO	6,290			YES	6,290
RHINELANDER	330			YES	330
RICHMOND	7,230	YES	7,230		
ROANOKE	1,770	YES	1,770		
ROCHESTER	3,430			YES	3,430
ROCKFORD	1,250			YES	1,250
SACRAMENTO	7,690			YES	7,690
SAGINAW	2,090	YES	2,090		
SALT LAKE CITY	17,540			YES	17,540
SAN DIEGO	34,520	YES	34,520		
SAN FRANCISCO	175,690	YES	175,690	YES	175,690
SAN JUAN	15,090				
SANTA ANA	13,300	YES	13,300	YES	13,300
SARASOTA/BRADENTON	9,040	YES	9,040		
SCRANTON/WILKES-BARRE	1,610	YES	1,610		
SEATTLE	29,480	YES	29,480	YES	29,480
SIOUX CITY	760			YES	760
SIOUX FALLS	1,300			YES	1,300
SO. BEND	5,380	YES	5,380		
SPOKANE	3,070			YES	3,070
STATE COLLEGE	370	YES	370		
ST. LOUIS	28,570	YES	28,570		
TAMPA	186,290	YES	186,290		
TOLEDO	710	YES	710		
TUCSON	15,070			YES	15,070
WASHINGTON	45,040	YES	45,040		
WATERTOWN	20			YES	20
WAUSAU	1,100			YES	1,100

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY
HAVE FAR MORE TRAFFIC THAN NORTHWEST'S BEYOND CITIES
(REBUTTAL TO NW-301)

	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>USAIR VIA</u> <u>PITTSBURGH</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>NORTHWEST</u> <u>via MINNEAPOLIS</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>
ST PALM BEACH	21,060	YES	21,060		
WHITE PLAINS	820	YES	820		
WILLIAMSPORT	520	YES	520		
YOUNGSTOWN	210	YES	210		
TOTAL	3,547,880	84	3,412,830	42	712,430

Notes: Excludes cities with excessive circuitry.

For MSP, cities include those cited in NW's filing with roundtrip non-stop connections to YYZ.

For PIT, cities include those cited in US's filing with roundtrip non-stop connections to YYZ.

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY
HAVE FAR MORE TRAFFIC THAN TWA'S BEYOND CITIES
(REBUTTAL TO TW-301)

	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>USAIR VIA</u> <u>PITTSBURGH</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>TWA</u> <u>via ST. LOUIS</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>
AKRON/CANTON	520	YES	520		
ALBANY	2,070	YES	2,070		
ALBUQUERQUE	8390			YES	8,390
ALLENTOWN	3,270	YES	3,270		
ALTOONA	120	YES	120		
ASHLAND, KY/HUNTINGTON	310	YES	310		
ATLANTA	90,440	YES	90,440		
AUSTIN	11,130	YES	11,130	YES	11,130
BALTIMORE	19,580	YES	19,580		
BINGHAMTON	90	YES	90		
BOSTON	213,410	YES	213,410		
BURLINGTON, IO	570			YES	570
BURLINGTON, VE	1,310	YES	1,310		
CEDAR RAPIDS/IOWA	4360			YES	4,360
CHAMPAIGN	1160			YES	1,160
CHARLESTON	540	YES	540		
CHARLOTTESVILLE	1,060	YES	1,060		
CHARLOTTE	19,900	YES	19,900		
CHICAGO	325,130	YES	325,130		
CINCINNATI	8,340	YES	8,340		
CLARKSBURG	320	YES	320		
CLEVELAND	52,910	YES	52,910		
COLORADO SPRINGS	4280			YES	4,280
COLUMBIA, MISSOURI	120			YES	120
COLUMBUS, OH	11,410	YES	11,410		
CUMBERLAND	150	YES	150		
DALLAS/FT. WORTH	108,920	YES	108,920	YES	108,920
DAYTON	3,390	YES	3,390		
DECATUR	350			YES	350
DENVER	41,960	YES	41,960	YES	41,960
DES MOINES	5610			YES	5,610
DETROIT	81,870	YES	81,870		
EVANSVILLE	1900			YES	1,900
FAYETTEVILLE, AR	3010			YES	3,010
FLINT	720	YES	720		
FT. LAUDERDALE	34,950	YES	34,950		
FT. MYERS	15,100	YES	15,100		
FT. WAYNE	3,690	YES	3,690		
GRAND RAPIDS	10,610	YES	10,610		
GREENBRIER	60	YES	60		
GREENSBORO/HIGH POINT	8,330	YES	8,330		
HAGERSTOWN	340	YES	340		
HARRISBURG	4,710	YES	4,710		
HARTFORD	24,040	YES	24,040		
HOUSTON	22,530	YES	22,530		
INDIANAPOLIS	15,520	YES	15,520		
ISLIP/LONG ISLAND	990	YES	990		
JOHNSTOWN	50	YES	50		
JOPLIN	350			YES	350
KALAMAZOO	3,920	YES	3,920		
KANSAS CITY	21,180	YES	21,180	YES	21,180
KNOXVILLE	4,440	YES	4,440		
LANCASTER	860	YES	860		
LANSING	1,570	YES	1,570		

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY
HAVE FAR MORE TRAFFIC THAN TWA'S BEYOND CITIES
(REBUTTAL TO TW-301)

	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>USAIR VIA</u> <u>PITTSBURGH</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>TWA</u> <u>via ST. LOUIS</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>
LAS VEGAS	32,500	YES	32,500	YES	32,500
LEXINGTON/FRANKFORT	2,120	YES	2,120		
LINCOLN	2360			YES	2,360
LITTLE ROCK	4060			YES	4,060
LOS ANGELES	242,650	YES	242,650	YES	242,650
LOUISVILLE	7,230	YES	7,230		
LYNCHBURG,VA	440	YES	440		
MANCHESTER	1,690	YES	1,690		
MEMPHIS	11470			YES	11,470
MIAMI	208,180	YES	208,180		
MILWAUKEE	25,760	YES	25,760		
MINNEAPOLIS/ST.PAUL	53,220	YES	53,220	YES	53,220
MOLINE	3480			YES	3,480
MORGANTOWN	160	YES	160		
NASHVILLE	45,340	YES	45,340		
NEW ORLEANS	30,250	YES	30,250	YES	30,250
NEWARK	752,110	YES	752,110		
NEWBURGH	340	YES	340		
NORFOLK	5,240	YES	5,240		
OKLAHOMA CITY	4390			YES	4,390
OMAHA	5510			YES	5,510
ONTARIO	9580			YES	9,580
ORLANDO	67,810	YES	67,810		
PADUCAH	310			YES	310
PARKERSBURG	230	YES	230		
PEORIA	1660			YES	1,660
PHILADELPHIA	111,630	YES	111,630		
PHOENIX	56,890	YES	56,890	YES	56,890
PORTLAND	13560			YES	13,560
PROVIDENCE	2,330	YES	2,330		
QUINCY	170			YES	170
RALEIGH/DURHAM	30,440	YES	30,440		
READING	810	YES	810		
RICHMOND	7,230	YES	7,230		
ROANOKE	1,770	YES	1,770		
SACRAMENTO	7690			YES	7,690
SAGINAW	2,090	YES	2,090		
SALT LAKE CITY	17540			YES	17,540
SAN ANTONIO	12080			YES	12,080
SAN DIEGO	34,520	YES	34,520	YES	34,520
SAN FRANCISCO	175,690	YES	175,690	YES	175,690
SAN JOSE	13840			YES	13,840
SANTA ANA	13,300	YES	13,300	YES	13,300
SARASOTA/BRADENTON	9,040	YES	9,040		
SCANTON/WILKES-BARRE	1,610	YES	1,610		
SEATTLE	29,480	YES	29,480	YES	29,480
SHREVEPORT	1640			YES	1,640
SIOUX FALLS	1300			YES	1,300
SOUTH BEND	5,380	YES	5,380		
SPRINGFIELD,IL	800			YES	800
SPRINGFIELD, MO	1170			YES	1,170
STATE COLLEGE	370	YES	370		
ST. LOUIS	28,570	YES	28,570		
TAMPA	186,290	YES	186,290		

USAIR'S BEYOND CITIES WITH NONSTOP SERVICE TO THE GATEWAY
HAVE FAR MORE TRAFFIC THAN TWA'S BEYOND CITIES
(REBUTTAL TO TW-301)

	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>USAIR VIA</u> <u>PITTSBURGH</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>	<u>TWA</u> <u>via ST. LOUIS</u>	<u>FY JUNE 94</u> <u>TORONTO</u> <u>TRAFFIC</u>
TOLEDO	710	YES	710		
TULSA	5450			YES	5,450
WASHINGTON	45,040	YES	45,040		
WATERLOO	780			YES	780
WEST PALM BEACH	21,060	YES	21,060		
WHITE PLAINS	820	YES	820		
WICHITA	4300			YES	4,300
WILLIAMSPORT	520	YES	520		
WORCESTER	210				
YOUNGSTOWN	210	YES	210		
TOTAL	3,566,280	84	3,412,830	46	1,004,930

Notes: Excludes cities with excessive circuitry.

For STL, cities include those cited in TWA's filing with roundtrip non-stop connections to YYZ.

For P.I.T, cities include those cited in US's filing with roundtrip non-stop connections to YYZ

USAIR'S FORECAST IS THE MOST CONSERVATIVE AMONG THE APPLICANTS

USAIR'S GROWTH RATES EXCLUDING SERVICE STIMULATION ARE MORE CONSERVATIVE
THAN THE OTHER APPLICANTS
(REBUTTAL TO CO-301, DL-301, NW-301, AND TW-301)

	ANNUAL GROWTH 1/	GROWTH TO YEAR ENDING MARCH 1996 2/	OTHER APPLICANTS GREATER THAN USAIR (PERCENTAGE POINTS)
USAIR	1.9%	3.3%	-
CONTINENTAL	5.0%	15.0%	11.7
TWA	4.5%	7.8%	4.5
DELTA	3.0%	6.4%	3.1
NORTHWEST	3.0%	6.3%	3.0

1/ CO-301, DL-301, NW-301, TW-301 EXCLUDING STIMULATION AND INCLUDING OTHER ADJUSTMENTS.

2/ CO, DL, AND NW GROWTH RATES REDUCED BY 0.5 PERCENTAGE POINTS TO REFLECT ACTUAL GROWTH FROM CY 1993 BASE TO FY 1994. CO, DL, AND NW USED THE CY 1993 BASE FOR FORECASTING INSTEAD OF FY 1994.

**USAIR'S TRAFFIC AND LOAD FACTORS WOULD INCREASE SIGNIFICANTLY
IF IT USED THE OTHER APPLICANTS TRAFFIC GROWTH RATES**

USAIR'S GROWTH RATES EXCLUDING SERVICE STIMULATION ARE MORE CONSERVATIVE THAN THE OTHER APPLICANTS
(REBUTTAL TO CO-301, DL-301, NW-301, AND TW-301)

	USAIR'S TRAFFIC FORECAST INCLUDING OTHER CARRIERS GROWTH 1/	INCREASE IN USAIR'S TRAFFIC FORECAST	USAIR'S LOAD FACTOR INCLUDING OTHER CARRIERS GROWTH	INCREASE IN LOAD FACTOR (PERCENTAGE POINTS)
USAIR	158,000	-	63.2%	-
CONTINENTAL	176,486	18,486	70.6%	7.4
TWA	165,105	7,105	66.0%	2.8
DELTA	162,861	4,861	65.1%	1.9
NORTHWEST	162,713	4,713	65.1%	1.9

1/ SOURCE: US-R-110, INCREASED GROWTH APPLIED TO USAIR'S TRAFFIC FORECAST.

USAIR'S SERVICE VIA PITTSBURGH WILL CARRY MORE
BEHIND GATEWAY TRAFFIC THAN ANY OTHER APPLICANT
(REBUTTAL TO CO-301, DL-301, NW-301, AND TW-301)

	GATEWAY	BEHIND GATEWAY TRAFFIC 1/	USAIR'S BEHIND GATEWAY TRAFFIC GREATER THAN OTHER APPLICANTS
USAIR	PITTSBURGH	142,441	
TWA	ST. LOUIS	58,941	83,500
CONTINENTAL	NEWARK	66,068	76,373
NORTHWEST	MINNEAPOLIS	90,928	51,513
DELTA	ATLANTA	103,426	39,015

1/ US-R-101.

USAIR WILL OFFER MORE SEATS THAN ANY OTHER APPLICANT
(REBUTTAL TO: CO-201, DL-101, NW-202, AND TW-151)

	USAIR'S SEATS PER FLIGHT 1/	USAIR'S ANNUAL SEATS 2/	USAIR'S ANNUAL SEATS GREATER THAN OTHER APPLICANTS	% USAIR GREATER THAN OTHER APPLICANTS
USAIR	182	265,720		
NORTHWEST	100	146,000	119,720	82.0%
CONTINENTAL	128	186,880	78,840	42.2%
TWA	132	192,720	73,000	37.9%
DELTA	180	262,800	2,920	1.1%

1/ US-R-101.

2/ BASED ON NORMAL YEAR FOR PROPOSED SCHEDULES. USAIR'S SEATS IN FORECAST PERIOD
REFLECT DC-9 OPERATIONS DURING THE FIRST MONTH STARTUP PERIOD.

USAIR WILL OFFER MORE SEATS TO SINGLE PLANE BEHIND POINTS THAN ANY OTHER APPLICANT
(REBUTTAL TO: CO-201, DL-101, NW-202, AND TW-151)

	USAIR'S SEATS PER FLIGHT 1/	USAIR'S ANNUAL SEATS TO BEHIND POINTS 2/	USAIR'S ANNUAL SEATS GREATER THAN OTHER APPLICANTS	% USAIR GREATER THAN OTHER APPLICANTS
USAIR	182	265,720		
DELTA	-	0	265,720	N/A
NORTHWEST	100	146,000	119,720	82.0%
CONTINENTAL	128	186,880	78,840	42.2%
TWA	132	192,720	73,000	37.9%

1/ US-R-101.

2/ BASED ON NORMAL YEAR FOR PROPOSED SCHEDULES. USAIR'S SEATS IN FORECAST PERIOD REFLECT DC-9 OPERATIONS DURING THE FIRST MONTH STARTUP PERIOD.

USAIR'S CURRENT ACCESS TO TORONTO FROM ITS HUBS IS LIMITED
(REBUTTAL TO CO-502)

USAIR HUB	JET SERVICE TO TORONTO
PITTSBURGH	NO
CHARLOTTE	NO
PHILADELPHIA	YES
BALTIMORE	NO

CONTINENTAL IS AUTHORIZED FOR US GATEWAY SERVICE TO TORONTO

(REBUTTAL TO CO-502)

CARRIER	AUTHORIZED US GATEWAY
CONTINENTAL	HOUSTON Exemption authority Order 95-2-52

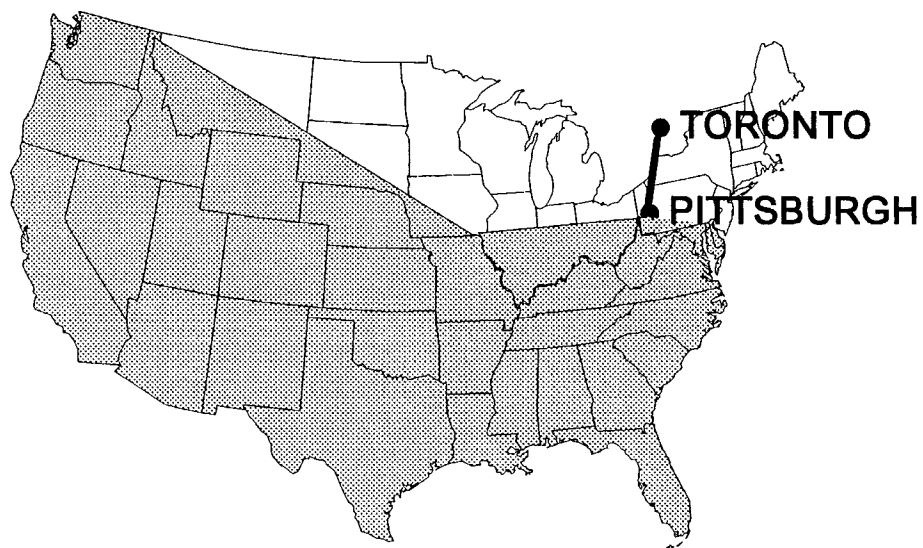
CITIES IN CONTINENTAL'S NEWARK FORECAST
THAT MAY BE BETTER SERVED VIA HOUSTON

ALBUQUERQUE
CORPUS CHRIST
EL PASO
HARLINGEN
HOUSTON
LAS VEGAS
LAKE CHARLES
LAFAYETTE
LAREDO
MIDLAND/ODESSA
NEW ORLEANS
PHOENIX
SAN ANTONIO
TUCSON
VICTORIA, TEXAS

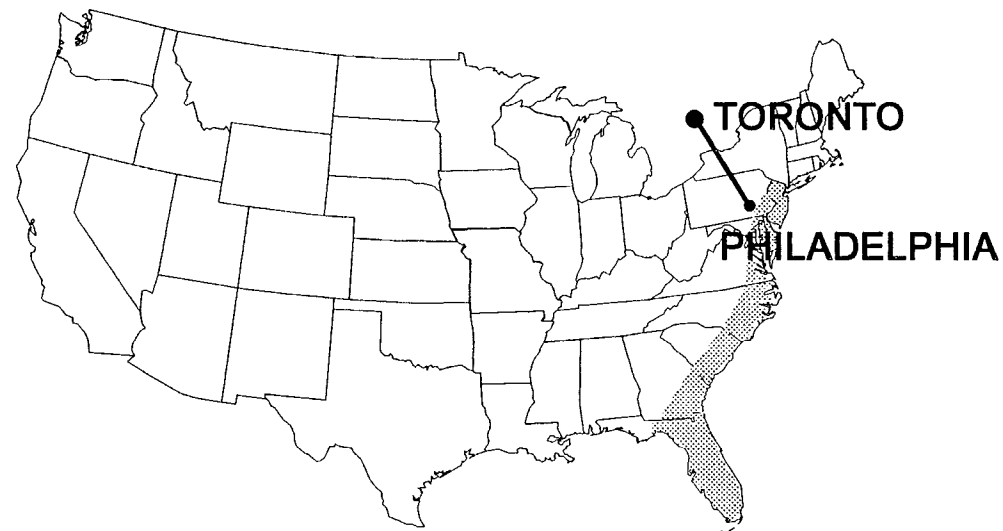
**USAIR'S PITTSBURGH HUB OFFERS MUCH BROADER
NON-CIRCUITOUS ACCESS TO TORONTO THAN ITS PHILADELPHIA HUB**

(REBUTTAL TO: CO-502, TW-100)

PITTSBURGH HUB



PHILADELPHIA HUB



NOTE: SHADED AREA INDICATES 25% OR LESS CIRCUITY TO TORONTO VIA PITTSBURGH AND PHILADELPHIA.

**PITTSBURGH IS A MORE DIRECT GATEWAY TO TORONTO THAN PHILADELPHIA
FOR 80 USAIR CITIES WITH 2.4 MILLION TORONTO PASSENGERS**
(REBUTTAL TO: CO-502 AND TW-100)

	<u>TORONTO TRAFFIC FY 1994 1/</u>	<u>TORONTO NONSTOP MILES</u>	<u>VIA PITTSBURGH MILES</u>	<u>CIRCUITY</u>	<u>VIA PHILADELPHIA MILES</u>	<u>CIRCUITY</u>
AKRON/CANTON	520	212	292	37.4%	681	220.4%
ALBUQUERQUE	8,390	1,551	1,705	9.9%	2090	34.7%
ALTOONA	120	243	324	33.1%	512	110.6%
ATLANTA	90,440	740	748	1.1%	1012	36.8%
AUSTIN	11,130	1,354	1,428	5.4%	1773	30.9%
BALTIMORE	19,580	347	432	24.4%	437	25.9%
BINGHAMTON	90	211	473	123.9%	513	142.7%
BIRMINGHAM	4,510	797	820	2.9%	1118	40.2%
BURLINGTON	1,310	326	676	107.4%	683	109.6%
CHARLESTON, WV	540	381	385	1.1%	702	84.5%
CHARLOTTESVILLE	1,060	387	410	5.7%	556	43.6%
CHARLOTTE	19,900	588	588	0.0%	794	35.1%
CHICAGO	325,130	436	634	45.5%	1023	134.9%
CINCINNATI	8,340	413	478	15.6%	852	106.3%
CLARKSBURG/FAIRMONT	320	305	305	0.2%	615	102.0%
CLEVELAND	52,910	193	328	69.6%	709	266.7%
COLUMBUS	11,410	305	366	19.9%	751	146.4%
CUMBERLAND	150	284	320	12.6%	535	88.0%
DALLAS/FT. WORTH	108,920	1,199	1,288	7.4%	1647	37.4%
DAYTON	3,390	352	436	23.8%	822	133.5%
DENVER	41,960	1,325	1,521	14.8%	1912	44.4%
DETROIT	81,870	214	423	98.1%	799	274.1%
ELMIRA/CORNING	30	173	430	148.1%	527	203.9%
EVANSVILLE	1,900	568	647	14.0%	1018	79.4%
FLINT	720	213	471	121.6%	836	293.1%
FRANKLIN/OIL CITY	30	159	287	80.0%	610	282.9%
FT. LAUDERDALE	34,950	1,217	1,218	0.1%	1341	10.2%
FT. MYERS	15,100	1,190	1,190	0.0%	1341	12.7%
FT. WAYNE	3,690	340	484	42.3%	875	157.5%
GRAND RAPIDS	10,610	302	541	79.4%	918	204.4%
GREENBRIER, WV	60	404	404	0.0%	657	62.6%
GREENSBORO, NC	8,330	525	526	0.3%	712	35.8%
HAGERSTOWN	340	291	365	25.2%	479	64.5%
HARRISBURG/YORK	4,710	282	406	43.8%	430	52.4%
HOUSTON	22,530	1,280	1,339	4.5%	1670	30.4%
HUNTINGTON	310	398	414	4.1%	752	89.2%
INDIANAPOLIS	15,520	439	546	24.5%	932	112.6%
JACKSONVILLE, FL	9,190	919	919	0.0%	1090	18.6%
JOHNSTOWN	50	236	297	25.7%	539	128.5%
KALAMAZOO/BATTLE CREEK	3,920	316	523	65.7%	908	187.4%
KANSAS CITY	21,180	837	994	18.8%	1383	65.3%
KNOXVILLE	4,440	591	604	2.2%	900	52.3%
LANSING	1,570	257	497	93.1%	871	238.4%
LAS VEGAS	32,500	1,939	2,128	9.7%	2518	29.8%
LEXINGTON/FRANKFORT	2,120	468	510	9.0%	865	84.7%
LOS ANGELES	242,650	2,171	2,353	8.4%	2743	26.3%
LOUISVILLE	7,230	496	556	12.2%	922	85.8%
LYNCHBURG	440	439	447	1.7%	623	41.8%
MEMPHIS	11,470	812	873	7.5%	1219	50.2%
MIAMI	208,180	1,236	1,237	0.1%	1362	10.2%
MILWAUKEE	25,760	419	652	55.8%	1035	147.3%
MINNEAPOLIS/ST. PAUL	53,220	677	947	40.0%	1325	95.8%
MORGANTOWN	160	279	282	1.1%	595	113.1%
NASHVILLE	45,340	641	683	6.5%	1020	59.1%
NEW ORLEANS	30,250	1,111	1,140	2.6%	1434	29.1%
NEWPORT NEWS	770	481	529	9.9%	548	13.8%

**PITTSBURGH IS A MORE DIRECT GATEWAY TO TORONTO THAN PHILADELPHIA
FOR 80 USAIR CITIES WITH 2.4 MILLION TORONTO PASSENGERS**
(REBUTTAL TO: CO-502 AND TW-100)

	<u>TORONTO TRAFFIC FY 1994 1/</u>	<u>TORONTO NONSTOP MILES</u>	<u>VIA PITTSBURGH</u>		<u>VIA PHILADELPHIA</u>	
			<u>MILES</u>	<u>CIRCUITY</u>	<u>MILES</u>	<u>CIRCUITY</u>
NORFOLK	5,240	502	552	9.9%	559	11.3%
ORANGE COUNTY	13,300	2,154	2,332	8.3%	2721	26.4%
ORLANDO	67,810	1,058	1,058	0.0%	1210	14.4%
PARKERSBURG	230	314	323	3.0%	678	116.2%
PHOENIX/SCOTTSDALE	56,890	1,872	2,032	8.5%	2417	29.1%
PITTSBURGH	31,120	222	223	0.3%	614	176.3%
RALEIGH/DURHAM	30,440	541	550	1.7%	683	26.3%
RICHMOND	7,230	443	480	8.4%	545	22.9%
ROANOKE	1,770	439	441	0.3%	657	49.5%
SAGINAW	2,090	223	511	128.8%	868	288.9%
SAN ANTONIO	12,080	1,425	1,497	5.1%	1840	29.2%
SAN DIEGO	34,520	2,153	2,324	7.9%	2711	25.9%
SAN FRANCISCO	175,690	2,254	2,470	9.6%	2862	27.0%
SARASOTA/BRADENTON	9,040	1,137	1,137	0.0%	1305	14.8%
SEATTLE/TACOMA	29,480	2,055	2,341	14.0%	2719	32.3%
SOUTH BEND	5,380	366	550	50.2%	939	156.6%
STATE COLLEGE	370	220	347	57.8%	499	127.0%
ST. LOUIS	28,570	653	774	18.5%	1158	77.3%
TAMPA	186,290	1,097	1,097	0.0%	1268	15.6%
TOLEDO	710	257	423	64.8%	810	215.7%
WASHINGTON	45,040	360	426	18.5%	466	29.5%
WEST PALM BEACH	21,060	1,175	1,176	0.1%	1300	10.6%
WILLIAMSPORT	520	218	403	85.1%	476	118.9%
YOUNGSTOWN	210	176	280	59.4%	647	268.3%
	2,376,340					
TOTAL TORONTO O&D	3,857,460					
PER CENT OF TOTAL	62%					

1/ DOT INFORMATION RESPONSE U.S.-TORONTO O&D.
NOTE: MILEAGE FROM COMPANY RECORDS.

**CONTINENTAL'S SERVICE PROPOSAL WILL DUPLICATE
AIR CANADA'S NEWARK TORONTO SERVICE**
(REBUTTAL TO CO-201)

AIR CANADA
DEPARTURES TO TORONTO
FROM NEWARK
APRIL 3, 1995

AIR CANADA
DEPARTURES TO NEWARK
FROM TORONTO
APRIL 7, 1995

08:00

07:50

CO PROPOSED

08:10

10:30

10:40

12:45

13:40

CO PROPOSED

15:04

16:15

15:15

17:10

17:50

CO PROPOSED

17:50

18:55

20:00

CO PROPOSED

20:30

SOURCE: OAG AND AND CO-201.

NOTE: AIR CANADA OWNS 19.6% OF CONTINENTAL.

CONTINENTAL WILL DUPLICATE ITS OWNER'S (AIR CANADA) ONLINE
CODE SHARE CONNECTIONS TO POINTS BEYOND NEWARK
(REBUTTAL TO CO-202)

POTENTIAL CODE SHARE CONNECTIONS FOR AIR CANADA IN NEWARK

ARRIVALS
AIR CANADA
LV 07:50
AR 09:10

CONTINENTAL DEPARTURE TO:	TIME
ATLANTA	1000
ATLANTIC CITY	1000
BOSTON	1000
WORCESTER	1000
PHILADELPHIA	1010
RICHMOND	1015
TAMPA	1020
FT. LAUDERDALE	1020
WEST PALM BEACH	1025
DETROIT	1025
MANCHESTER ,NH	1025
DAYTONA BEACH	1025
FT. MYERS	1025
PORTLAND	1025
BUFFALO	1030
SAN JUAN	1035
ALLENTOWN	1035
DENVER	1035
BANGOR	1040
PROVIDENCE	1040
HOUSTON	1045
MIAMI	1045
ORLANDO	1100
CHICAGO	1100
WASHINGTON	1100
ROCHESTER	1120
NORFOLK	1140
HARRISBURG	1140
HARTFORD	1145
CLEVELAND	1150
COLUMBUS	1205
INDIANAPOLIS	1230
ALBANY	1230

ARRIVALS
AIR CANADA
LV 17:50
AR 19:10

CONTINENTAL DEPARTURE TO:	TIME
ORLANDO	1940
SYRACUSE	1945
HOUSTON	1950
GREENSBORO	1950
FT. MYERS	1950
CLEVELAND	1950
JACKSONVILLE	1950
BANGOR	1955
BUFFALO	1955
PHOENIX	1955
ATLANTIC CITY	1955
ST. LOUIS	1955
PHILADELPHIA	1955
CHICAGO	2000
PROVIDENCE	2000
WASHINGTON	2000
RICHMOND	2000
ALLENTOWN	2000
BOSTON	2000
BINGHAMTON	2000
ATLANTA	2000
SARASOTA	2005
MIAMI	2005
TAMPA	2005
LOS ANGELES	2010
KANSAS CITY	2010
MANCHESTER, NH	2015
BURLINGTON	2015
ROCHESTER	2015
HARRISBURG	2015
WORCESTER	2015
DETROIT	2015
ALBANY	2220
WEST PALM BEACH	2030
BALTIMORE	2030
DAYTON	2035
FT. LAUDERDALE	2035
PORTLAND	2105
HARTFORD	2110

SOURCE: OAG CO-201, AND CO-202.

NOTE: DOES NOT INCLUDE ADDITIONAL CONNECTIONS TO EIGHT OTHER AIR CANADA FLIGHTS.

Certificate of Service

I certify that on this day I served the Rebuttal Exhibits of USAir, Inc. by hand-delivery, or by air courier if so indicated, upon the following:

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Cathleen P. Peterson

April 4, 1995